

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

STREAM TV NETWORKS, INC., *et al.*,<sup>1</sup>

Debtors.

STREAM TV NETWORKS, INC., and  
TECHNOVATIVE MEDIA, INC.

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS  
VI, LLC, HAWK INVESTMENT HOLDINGS  
LIMITED, ARTHUR LEONARD ROBERT  
“BOB” MORTON, SEECUBIC, INC.,  
ALASTAIR CRAWFORD, KRZYSZTOF  
KABACINSKI, KEVIN GOLLOP, ASAF  
GOLA, JOHN DOE(S), JANE DOE(S),  
DELAWARE and OTHER LAW FIRMS  
representing and acting in concert with John  
Doe(s) and/or Jane Doe(s), INVESTMENT  
BANKS employed by John Doe(s) and/or Jane  
Doe(s), PATRICK THEUNE, and SEECUBIC  
B.V.,

Defendants.

Chapter 11

(Jointly Administered)

Case No. 23-10763 (MDC)

A.P. No. 23-00057-mdc

**DEFENDANTS HAWK INVESTMENT HOLDINGS LIMITED  
AND ARTHUR LEONARD ROBERT MORTON’S MOTION TO  
DISMISS PLAINTIFFS’ COMPLAINT FOR LACK OF PERSONAL JURISDICTION,  
FAILURE TO OBTAIN SERVICE, AND FOR FAILURE TO STATE A CLAIM**

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<sup>1</sup> The Debtors, along with the last four digits of the Debtors’ federal tax identification number are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3<sup>rd</sup> Floor, Philadelphia, PA 19103.

Defendants Hawk Investment Holdings Limited (“Hawk”) and Arthur Leonard Robert Morton (“Mr. Morton”) submit this motion pursuant to Rule 12(b)(2), 12(b)(5), and 12(b)(6) of the Federal Rule of Civil Procedure (the “Rules”)<sup>2</sup> to dismiss the complaint [AP Docket No. 1] (the “Complaint”) filed by Stream TV Network, Inc. (“Stream”) and Technovative Media, Inc. (“Technovative” and, together with Stream, the “Plaintiffs” or “Debtors”).

The grounds for the Motion for lack of personal jurisdiction, insufficient service, and failure to state a claim upon which relief can be granted are set forth more fully in the *Brief in Support of Defendants Hawk Investment Holdings Limited and Arthur Leonard Robert Morton’s Motion to Dismiss Plaintiffs’ Complaint for Lack of Personal Jurisdiction, Failure to Obtain Service, and for Failure to State a Claim* (the “Brief”)<sup>3</sup> filed contemporaneously herewith.

Dated: November 13, 2023

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<sup>2</sup> FRCP 12(b) is applicable to this proceeding pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings given to them in the Brief.

-and-

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and Arthur Leonard Robert Morton*